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August 8, 2011

VIA HAND DELIVERY

Gregory P. Mouton
New York City Law Department
100 Church Street
New York, New York 10007

Re: Matthews and Allan v. City of New York et al., 10 CV 4991 (KAM)(RML)

Dear Mr. Mouton:

I represent the plaintiffs in the above-referenced case. Enclosed please find Plaintiffs' Responses and Objections to Defendants' First Set of Interrogatories And Request For Production of Documents to Plaintiffs. Additionally, please be advised that defendants' responses to Plaintiffs' First Set of Interrogatories and Request For Production of Documents to Defendants dated March 10, 2011 are extremely overdue. Defendants' responses to plaintiffs' discovery requests were due on April 10, 2011 and are now four months overdue. Therefore, please provide plaintiffs responses to their requests by August 12, 2011; otherwise plaintiffs will be forced to seek judicial intervention. If you are unable to provide responses by said date, then please contact me immediately so that we can meet and confer about how to resolve this dispute without judicial intervention.

Thank you for your prompt attention to these matters.

Very truly yours,

JACOBS & HAZAN, LLP

A handwritten signature in black ink that reads "David M. Hazan, Esq."

DAVID M. HAZAN, ESQ.